

**Commonwealth of Kentucky
Division for Air Quality**

RESPONSE TO COMMENTS

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-05-037

Dow Corning Corporation

760 Hodgenville Road

Elizabethtown, KY 427012

November 15, 2006

Ralph Gosney, P.E. Reviewer

SOURCE I.D: 021-093-00005

AGENCY INTEREST #: 1658

ACTIVITY ID: APE20040002

SOURCE DESCRIPTION:

An operating permit application was received from Dow Corning Corporation on October 30, 2003 and was deemed complete on January 31, 2006. The applicant proposes to operate equipment at this source that is used in the production of various adhesives and sealants. The equipment at the plant is organized in the permit according to the processing areas at this facility, inclusive of the support areas such as plant heating. This permit is a renewal of the source's plant-wide Conditional Major operating permit.

PUBLIC AND U.S. EPA REVIEW:

On September 27, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The News-Enterprise* in Elizabethtown, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Dow Corning Corporation on October 25, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

ATTACHMENT A

Response to Comments

Comments on Dow Corning Company's silicon adhesive and sealants manufacturing plant Draft Conditional Major Air Quality Permit submitted by Rebecca Akers, Environmental Engineer.

Permit Statement of Basis

1. Page 1, Source Description: The first comment is in regards to the lower permit limitations for single HAPs of 9 tons/year, total HAPs of 22.5 tons/year, particulate matter of 90 tons/year, VOCs of 90 tons/year, and other criteria pollutants. The wording in the statement of basis is that we requested voluntary permit emission limits. We feel this is somewhat misleading. Dow Corning was asked to take these limits by the Division of Air Quality, but we would prefer to operate under our current limits of <10 tons/year for single HAPs, <25 tons/year for total HAPs, <90 tons/year for VOCs and <90 tons/year for particulate matter. By meeting the limits in our current permit, we still believe that we are meeting the federal requirements for the minor source threshold in 401 KAR 52:001.

Division's response: The Division has contacted the permittee regarding this comment and has provided verbal response. In summary, it has been explained to the permittee that the specified limits, which are 90% of the applicability thresholds that would otherwise subject the source to the air permitting requirements of 401 KAR 52:020 (Title V Permits), are necessary in order to ensure compliance with the status of this permit, i.e., Conditional Major status. The Division believes that limits reflective of 90% of the Title V applicability thresholds are necessary when the method of compliance demonstration is a rolling twelve (12) month basis, as is the case for this permit. Reducing the limits by 10% helps to ensure continuous compliance with the underlying limits for potential short-term high production periods, and also accounts for any trivial or insignificant activities that might not be included in Section C of the permit. It was further explained to the permittee that the full limits contained in their initial Conditional Major permit could be included in the renewal permit; however, the Division will only include such limits when the method of compliance demonstration is based on a short-term period, i.e., 365-day rolling basis. After providing such option to the permittee, the permittee verbally communicated their desire to maintain the 12-month rolling compliance demonstration period. Therefore, there are no changes to the source-wide emission limits or other conditions of permit due to this comment.

Conditional Major Permit

2. Various **Emission Limitations** in Section B of the permit: In regards to the compliance demonstration method for particulate matter, we feel these calculations are unnecessary. We have already demonstrated in our permit application that our potential to emit is much lower than the limits in the draft permit with the compliance demonstration.

Division's response: The compliance methods are necessary to demonstrate compliance with these limits. This is consistent with 401 KAR 52:030, Section 10, as well as Section 1.b of the related "Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Nonmajor Sources." There are no changes to the permit as result of this comment.

3. Various **Emission Limitations** in Section B of the permit: We feel that the opacity requirement listed in the permit is unnecessary. Under normal operating conditions, our plant does not have visible emissions from any of our stacks, so we feel the weekly requirement is excessive. This was noted during our most recent DAQ-Full Compliance Evaluation on September 5, 2006 by Jarrod Bell.

Division's response: The opacity limit is in the regulations and compliance with that limit has to be in the permit. The permittee shall perform a qualitative visual observation from each stack each week. An EPA Reference Method 9 is only required if emissions are seen. The compliance methods are necessary to demonstrate compliance with the opacity limit. This is consistent with 401 KAR 52:030, Section 10, as well as Section 1.b of the related "Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Nonmajor Sources." There are no changes to the permit as result of this comment.

4. Page 24, **Specific Monitoring Requirements** and **Specific Recordkeeping Requirements**: The fuel oil requirements listed in the specific monitoring requirements and recordkeeping requirements of our permit for the boilers (p. 24) are not consistent. We do not have the ability to burn anything but natural gas on our boilers. Therefore monitoring of fuel oil and any recordkeeping requirements associated with using fuel oil in our boilers are not applicable.

Division's response: The Division concurs and has revised the permit as requested by the source.

5. Pages 29, and 30, **Specific Recordkeeping Requirements** and **Specific Control Equipment Operating Conditions** respectively: There are condenser requirements mentioned in the recordkeeping (p. 29) and control equipment operating conditions sections (p.30) for the latex process. There is no condenser associated with this process, so these need to be removed from the permit.

Division's response: The Division concurs and has revised the permit as requested by the source.

6. Page 34, Section E: Source Control Equipment Requirements under specific control equipment operating conditions part b, c, and d, the permit requires us to record a differential pressure drop reading across each filter once per day, keep a log of these readings, and keep the minimum pressure drop monthly. We feel these requirements are not necessary based on the operations at our plant. Dow Corning prefers to operate where preventative maintenance assures compliance versus your proposal in the draft permit.

Division's response: The Division does not concur with this comment. Monitoring and recording of the units' differential pressure drop helps to ensure proper operation of the control device. This operating parameter is an appropriate indicator to ensure compliance with PM emissions allowable under 401 KAR 59:010. Also, this is not a new requirement as such was included in the initial Conditional Major permit issued to this source (F-97-005). There are no changes to the permit due to this comment.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.